

Deborah J. Broyles (SBN 167681)
Email: dbroyles@reedsmith.com
Tiffany Renee Thomas (SBN 239085)
Email: tthomas@reedsmith.com
REED SMITH LLP
101 Second Street, Suite 1800
San Francisco, CA 94105-3659
Telephone: +1 415 543 8700
Facsimile: +1 415 391 8269

Attorneys for Defendant
Charles Schwab & Co., Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JACQUELINE ANDERSON,

Plaintiff,

vs.

CHARLES SCHWAB AND COMPANY, INC.,
and DOES 1 through 100, inclusive,

Defendants.

No.: 3:12-cv-01682-MMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
EXTENDING DEFENDANT CHARLES
SCHWAB & CO., INC.'S TIME TO
RESPOND TO COMPLAINT**

Hon. Maxine M. Chesney

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

1 Plaintiff Jacqueline Anderson (“Plaintiff”) and Defendant Charles Schwab & Co., Inc.
2 (“Defendant”), by and through their undersigned counsel of record, hereby stipulate as follows:

3 WHEREAS, on January 11, 2013, the parties filed a Stipulation and [Proposed] Order
4 seeking leave for Plaintiff’s filing of a Third Amended Complaint [Doc 19];

5 WHEREAS, on January 15, 2013, this Court granted Plaintiff leave to file a Third Amended
6 Complaint [Doc. 20];

7 WHEREAS, on January 17, 2013, Plaintiff filed a Third Amended Complaint [Doc. 21];

8 WHEREAS, the Third Amended Complaint contains 270 separate and distinct paragraphs;

9 WHEREAS, Defendant intends to file an answer to the Third Amended Complaint;

10 WHEREAS, the parties stipulated to, and the court granted, an extension of Defendant’s time
11 to file its answer to March 1, 2013 [Docs. 22, 24]

12 WHEREAS, the parties stipulated to, and the court granted, an extension of Defendant’s time
13 to file its answer to March 15, 2013 [Docs. 22, 24]

14 WHEREAS, Defendant will be unable to complete its Answer by March 15, 2013;

15 WHEREAS, an extension of time will not affect the case management schedule for this
16 action; and

17 WHEREAS, the instant Stipulation and [Proposed] Order constitutes the parties’ third
18 request for a time modification in this action.

19
20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiff and
21 Defendant that:

22 Pursuant to this stipulation, the parties agree to continue Defendant’s deadline to file its
23 responsive pleading to the Third Amended Complaint from March 1, 2013 to March 22, 2013.

24
25 SO STIPULATED.
26
27
28

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

DATED: March 13, 2013

REED SMITH, LLP

By: /s/ Tiffany Renee Thomas

Deborah J. Broyles

Tiffany Renee Thomas

Attorneys for Defendant Charles Schwab & Co., Inc.

DATED: March 13, 2013

Law Offices of Murlene J. Randle

By: /s/ Murlene J. Randle

Murlene J. Randle

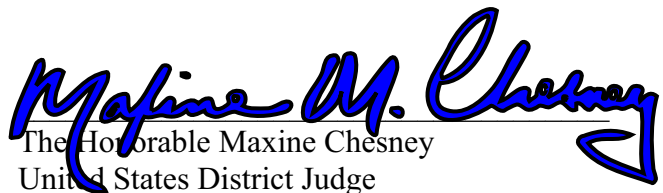
Attorneys for Plaintiff Jacqueline Anderson

ORDER

Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY ORDERED THAT Defendant Charles Schwab & Co., Inc. must file a responsive pleading to Plaintiff Jacqueline Anderson's Third Amended Complaint no later than March 22, 2013. Given the limited nature of the amendments and defendant's having been aware of said amendments no later than January 17, 2013, however, such extension shall not constitute good cause to amend the Pretrial Preparation Order in any manner.

IT IS SO ORDERED.

Dated: March 18, 2013


The Honorable Maxine Chesney
United States District Judge